

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

GARY GADLEY,

Case No.: 3:13-cv-00017

Plaintiff,

The Honorable Kim R. Gibson

v.

JERRY ELLIS trading as JERRY ELLIS
CONSTRUCTION,

Defendant.

**MOTION FOR LEAVE OF COURT TO FILE REPLIES
TO RESPONSES TO MOTION TO INTERVENE**

NOW COMES The Cincinnati Insurance Company (“Cincinnati”), by and through its undersigned counsel, Walsh, Barnes, Collis & Zumpella, P.C., and Adam M. Barnes, Esquire, and pursuant to the Court’s Practices and Procedures respectfully requests leave of Court to file replies to Defendant, Jerry Ellis t/a Jerry Ellis Construction’s Response to Motion to Intervene and Plaintiff, Gary Gadley’s Opposition to Motion to Intervene to address the factual and legal arguments raised therein, which is necessary to address the arguments asserted, including but not limited to the assertion that granting the Motion to Intervene will cause the need to postpone the trial of this matter, conduct additional discovery, create confusion with the jury and otherwise prejudice the parties to the case, as Cincinnati disputes all of these assertions.

WHEREFORE, The Cincinnati Insurance Company respectfully requests this Honorable Court grant its Motion for Leave and permit it to file responses to the Responses/Oppositions to the Motion to Intervene.

Respectfully submitted,

By: /s/ Adam M. Barnes
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of **MOTION FOR LEAVE OF COURT TO FILE REPLIES TO RESPONSES TO MOTION TO INTERVENE** has been served upon counsel of record via the ECF System for the United States District Court for the Western District of Pennsylvania on this 8th day of June, 2015.

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